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March 3, 2020

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

**RE: Application of Duke Energy Carolinas, LLC to Establish a Distributed Energy Resource Program
Docket No. 2015-55-E**

**Application of Duke Energy Progress, Incorporated to Establish a Distributed Energy Resource Program
Docket No. 2015-53-E**

Dear Ms. Boyd:

Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP," and together with DEC, the "Companies" or "Duke") propose to amend their Shared Solar Riders so that they more closely align with the original intent of the Shared Solar Program (the "Program") and to further encourage participation by low-income customers.

As explained in testimony supporting the Companies' applications to establish Distributed Energy Resource Programs, "[t]he Shared Solar program was designed so that participants realize bill savings relative to what their bills would have been if they did not subscribe to the program."¹ The program was further designed and intended to include "customers who do not have the capital or credit score to afford to purchase or lease a solar array."² In 2016, the Companies proposed, and the Commission approved, revisions to the Shared Solar Riders in order to encourage participation

¹ Jose Merino Test. at p. 16, Docket No. 2015-53-E (filed Mar.17, 2015); Jose Merino Test. at p. 16, Docket No. 2015-55-E (filed Mar. 17, 2015)

² Jose Merino Test. at p. 16, Docket No. 2015-53-E (filed Mar.17, 2015); Jose Merino Test. at p. 16, Docket No. 2015-55-E (filed Mar. 17, 2015).

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by low-income customers by providing for a waiver of the Application Fee and Initial Subscription Charge for certain eligible households.³

After Hurricane Florence in September 2018 a DEP Shared Solar facility was offline for two weeks, resulting in two DEP Shared Solar customers owing DEP under the Shared Solar Rider rather than the customers receiving bill savings. To prevent this from occurring again, the Commission approved, in Order No. 2019-43, the Companies' proposed tariff modifications that "zeroed-out" the Monthly Subscription Charge and Energy Credit for low-income customers in months where, due to a named tropical storm or hurricane, that charge would be greater than the Energy Credit calculated under the Riders.

In this filing, the Companies are proposing to expand this protection for low-income customer participants by amending the Shared Solar Riders to ensure that in any given month, low-income customer participants will not owe any additional payment to DEC or DEP as a result of participating in the Shared Solar Program. While the Program is designed to ensure that all participating customers receive a net benefit on an annual basis when comparing the Monthly Subscription Charge to the Energy Credit, it is inevitable that during some months, the Energy Credit will be less than the Monthly Subscription Charge, especially during winter months when the solar output is diminished. It has been Duke's experience that the potential for low-income customers to owe any additional payment on their electric bill in any month, is significant enough to deter low-income customers from participating in the Program. Accordingly, the Companies believe these changes to the Shared Solar Program are important in order to further low-income participation in the Shared Solar Program.

In addition to the changes described above for low-income customer participants, the Companies are also proposing the following modifications to the Riders:

- Modifications to the customers that are eligible to participate in the Program (the DEC and DEP billing systems cannot accommodate customers who are on a deferred payment arrangement or who participate in PrePaid Advantage);
- Adjustment of the eligibility requirements such that payment history does not impede a customer from enrolling, but the customer cannot have a past due balance at the time of enrollment;
- Clarification to the calculation of the "program year," after which the Initial Subscription Charge is reduced;
- Modifications to provide additional flexibility for customers to terminate participation in the Program; and
- Other ministerial changes to provide clarity or consistency between the tariffs for each utility.

³ Commission Order No. 2016-722 (Docket No. 2015-53-E) and Commission Order No. 2016-723 (Docket No. 2015-55-E).

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The proposed Shared Solar Rider changes are shown in redlined and clean format in Attachment A and B, respectively, for DEC, and Attachment C and D, respectively for DEP.

In order to ensure that low-income customer participants are able to receive the protections described herein for the winter of 2019, the Companies request the Commission approve the Shared Solar Riders with an effective date of December 1, 2019.

Sincerely,



Rebecca J. Dulin

Attachments

C: Parties of Record (via email w/ attachments)